

DECLARATION OF JULIE A. GOLDBERG

Coker v. Goldberg & Associates, et al. | 1:21-cv-01803-ER

I, Julie A. Goldberg, do hereby declare:

1. I am over 18 years of age, and if called upon to testify, I could and would competently testify to the following facts as the same are personally known to me.
2. I am an attorney at law, duly licensed to practice law in the State of California. I am a defendant in this action and I make this declaration in support of my response to Plaintiff's Letter Motion for Discovery [ECF 78].
3. I have been through my WhatsApp messages and I have turned over every single picture, message and voice text that did not have attorney-client confidential information.
4. If necessary, I am happy to do an in chambers meeting to demonstrate that I have turned over all the messages except those that are protected by the attorney-client privilege.
5. I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct. Executed on the date set forth below in Bronx, New York.

Date: May 17, 2023

By: Julie A. Goldberg